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November 11, 2024

Via ECF and E-mail

Honorable Claire Cecchi, U.S.D.C.J.
U.S. District Court-District of New Jersey
50 Walnut Street-MLK Building
Courtroom 5B
Newark, NJ 07101

Re: U.S.A. v. Scanlon No. 24-cr-0682 (CCC)

Dear Judge Cecchi:

We represent the Defendant, Christopher Scanlon, in a one-count indictment filed on October 11, 2024. Following the arraignment on October 24, 2024, the Government and Defense were unable to agree on a proposed continuance as well as productions under Rule 16, Brady disclosures, and a scheduling order. Consequently, the Government moved to exclude time under the Speedy Trial Act on October 25, 2024 (ECF 49) and requested a scheduling order with extended timeframes, which the defense found unacceptable. The Government alleges that this matter also qualifies for Complex Case designation, a fact to which we similarly objected. The Defense opposed this motion on October 28, 2024 (ECF 50), and the status of the motion remains pending.

Given the fundamental and constitutional nature of this issue, which impacts potential trial date, evidence production, and related court proceedings, we are respectfully inquiring as to the status of the Motion, especially as our client resides out of State and relocated his family including young children from England to the United States to maintain support.

We are, of course, deeply mindful, and deferential to Your Honor's calendar and workload and appreciate the equal importance of all cases on the docket. Our client is seeking to secure alleged evidence against him and address the indictment as quickly as provided for under the Speedy Trial Act.

Very truly yours,

COLE SCHOTZ P.C.

/s/ Michael S. Weinstein

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